

Office of the City Clerk



1017 Middlefield Road
Redwood City, California 94063
Telephone (650) 780-7220
FAX (650) 261-9102

January 24, 2011

Theresa Aguilar Finger, Special Projects Manager, MBA/TM, C.P.A.
Secretary of State
1500 11th Street, 6th Floor
Sacramento, CA 95814

Dear Ms. Aguilar Finger,

This letter is in response to the notice of Proposed Rulemaking for Trustworthy Electronic Document or Record Preservation.

After thoroughly reviewing the recommendations taken from section 5.4.1.4 of "AIIM ARP1-2009" on image formats, we find them to be ineffective, burdensome, and economically unfavorable. Our office has been utilizing Laserfiche to archive our documents in the TIFF file format and has documents dating back to 1900 readily available to internal and external customers. Choosing a format such as PDF-A, which is controlled by a single vendor, runs contrary to the principles of long-term preservation and archiving because there is no guarantee that the format will be supported in the years to come.

AIIM's suggestion that "the TIFF format be utilized with caution," and that organizations should instead adopt PDF-A as their archival standard, sends the wrong message to technology users and developers in California and the world. Presently there are thousands of state and local government organizations that have selected TIFF as a proven archival standard because it is robust and non-proprietary. In fact, technology providers such as Laserfiche build their software on an open architecture to ensure that system performance is continuously enhanced by advances in hardware, software and communication technologies. Constricting them to use of a proprietary format such as PDF-A stifles software development and inhibits the industry's ability to respond to customer needs.

Also, consider that there is no economic impact to federal or state agencies and minimal savings forecast; however there will be a cost to local & state agencies, not only monetary but significant labor and employee hours to implement thousands of TIFF documents to PDF/A.

For the reasons mentioned we strongly recommend that the Secretary of State not adopt the proposed recommendations.

Sincerely,

Dora Wong, Acting City Clerk
City of Redwood City